

Portative Technologies, LLC

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Marlene H. Dortch, Secretary
Federal Communications Commission
RE: GN Docket No. 12-354, RM-11778 and RM-11789

Portative Technologies, LLC is an Internet service provider, using mainly wireless technologies to serve the rural areas of Harrison and Floyd counties in Indiana where the cable company and the Frontier have shown no interest in providing service. Without our presence, under-served consumers are left to choose between satellite and cellular technology to gain access to the Internet. We rely heavily on unlicensed spectrum to deliver speeds well above 10mb to our customers at a fair and reasonable price.

The Commission adopted the new Citizens Broadband Radio service more than two years ago. In doing so you developed a world class spectrum sharing policy utilizing a three tier approach. The framework of small cell and short term licensing opens access to companies such as ourselves to make use of this band at a reasonable price. The policies you developed in regard to this band will help the digital divide in rural America.

The Comments by filed by the CTIA and T-Mobile asking for Economic Areas to be auctioned instead of census tracks and expanding the license to ten years should be dismissed. If the Commission adopts and institutes these rules you are effectively turning this band over to the cellular industry. Our economic area includes Louisville, KY where we provide no service but it also covers multiple rural counties in southern Indiana where numerous providers, such as ourselves, stand ready to invest and make use of the band.

We utilize have tested experimentally the 3650 spectrum today. Our testing has shown it to be an exceptional band for providing Internet to our customers. We are committed to deployment and significant investments in this band and strongly oppose the above referenced comments filed by the CTIA and T-Mobile.

Sincerely,

David L. Hulsebus
President
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